

### **REMARKS**

Claims 1, 6–10, 12–13, 25, 44 and 47–56 were previously pending in this application. Claims 19–24 and 35–40 have been previously withdrawn. Claims 2–5, 11, 14–18, 26–34, 42–43 and 45–46 have been canceled without prejudice or disclaimer. Claim 41 remains allowed. Claims 57 and 58 have been added and claims 1 and 25 have been amended herein. Applicants submit that no new matter has been added. Applicants respectfully request reconsideration of the Application in view of the foregoing amendments and the following remarks.

### **Claim Rejections – 35 U.S.C. § 102**

The Final Office Action dated January 20, 2006 rejected claims 1, 6, 8–9, 12, 25, 44, 47–50, 52–53 and 55 under 35 U.S.C. § 102(e) as being anticipated by Krueger et al., U.S. Patent No. 6,649,220 B1 or under 35 U.S.C. § 102(b) as being anticipated by Krueger et al., WO 00/21684. Applicants respectfully submit that the pending claims are patentably distinct from the cited references.

Amended independent claim 1 recites, inter alia:

An apparatus for processing a portion of an automobile body . . . comprising . . . a supporting device movably supporting the processing device and comprising a supporting block and a slidably supported structure, the slidably supported structure being movably engaged with the supporting block and free to exclusively slide in a widthwise direction of the automobile body, wherein such movement of the slidably supported structure is solely and directly in response to the processing device contacting the concave portion while the processing device moves relative to and along the concave portion. . . .

Applicants submit that the invention of Krueger et al. cannot anticipate amended independent claim 1 because it does not teach each and every element of this claim. See MPEP § 2131. Although the Advisory Action indicates that Krueger et al. disclose an applicator (49) which slides in two directions to effect relative movement between the applicator (49) and a workpiece,

Krueger et al. do not disclose a slidably supported structure (23) that slides within a supporting block (22) so as to effectuate movement in a widthwise direction of the automobile.

For at least this reason, Applicants respectfully submit that Krueger et al. do not teach or suggest each and every element recited in amended independent claim 1 and that this claim is, thus, patentably distinct from Krueger et al. Applicants further submit that amended independent claim 25, as well as claims 6, 8–9, 12, 44, 47–50, 52–53 and 55 depending directly or indirectly from independent claims 1 and 25, are patentably distinct from Krueger et al. for at least similar reasons. Accordingly, Applicants respectfully request withdrawal of these grounds of rejection.

#### **Claim Rejections – 35 U.S.C. § 103**

The Final Office Action dated January 20, 2006 rejected claims 7, 10, 13, 51, 54 and 56 under 35 U.S.C. § 103(a) as being unpatentable over Krueger et al., U.S. Patent No. 6,649,220 B1 or Krueger et al., WO 00/21684 in view of Clitheros et al., U.S. Patent No. 4,564,410. The Final Office Action dated January 20, 2006 also rejected claims 1, 6–10, 12–13, 25, 44 and 47–56 under 35 U.S.C. § 103(a) as being unpatentable over Clitheros et al. in view of Krueger et al. Applicants respectfully submit that the pending claims are patentably distinct from the cited references, taken either alone or in combination.

Krueger et al. disclose a compliance mechanism for applying fluid to an application surface, whereby an applicator tip maintains contact with the application surface via the exertion of a constant regulated pressure force to the applicator tip by fluid-operated cylinders. See Krueger et al., col. 1, ll. 8–14. The pressure-regulated cylinders of the compliance mechanism in Krueger et al. allow the applicator tip to accommodate changes in the shape of the application surface without losing contact during application of the fluid. See Krueger et al., col. 1, ll. 15–17. As indicated above, however, Krueger et al. are silent as to a supporting device having a “slidably supported structure being movably engaged with the

supporting block and free to exclusively slide in a widthwise direction of the automobile body.” As noted in the Advisory Action, the Krueger et al. mechanism employs a variety of cylinders for effecting a light touch movement between the applicator tip and the workpiece. See Advisory Action, 5/11/06, p. 2. Clearly, Krueger et al. do not, however, teach or suggest a slidably supported structure (23) movably engaged with a supporting block (22), wherein the slidably supported structure is free to exclusively slide so as to move the processing device in a widthwise direction.

Furthermore, the Advisory Action indicates that the cylinders of Krueger et al., namely first fluid operated cylinder (32) and second fluid operated cylinder (35), are capable of functioning in a manner identical to the driving cylinders (25, 27) disclosed in Applicants’ invention. See Advisory Action, 05/11/06, p. 2. Quite differently, however, while Krueger et al. require cylinders for moving the applicator (49) in widthwise and vertical directions, the driving cylinders (25, 27) of Applicants’ invention are provided only for initially aligning the processing device (20, 30) relative to the panel joint (J) and are not necessary to effectuate the movement of the slidably supported structure in response to the processing device contacting the concave portion.

Moreover, the invention of Clitheros et al. is specifically directed to preventing the application of adhesive material in excess to save expense and prevent damage to the motor vehicle body as a result of inadequate removal of excess adhesive material. See Clitheros et al., col. 2, ll. 1–6. Clitheros et al. disclose a dispenser means having a nozzle (16) and being movable via to a rigid framework of threaded (32) and unthreaded (30) guide rails rotated by drive motors (44, 74). See Clitheros et al., col. 2, ll. 12–19. Clitheros et al. are silent, however, as to an apparatus comprising a “slidably supported structure being movably engaged with the supporting block and free to exclusively slide in a widthwise direction of the automobile body . . . solely and directly in response to the processing device contacting the concave portion while the processing device moves relative to and along the concave portion.” Rather, Clitheros et al. impart motion to the nozzle (16) using a rigid framework of threaded (32) and unthreaded (30)

guide rails, whereby the physical engagement between guide rails and support block (28) is not exclusively slidable. Specifically, support block (28) is threadably engaged with screw-threaded guide rail (32), such that nozzle (16) will move in a widthwise direction only if guide rail (32) is rotatably driven.

Furthermore, movement of the nozzle (16) in Clitheros et al. is determined, in advance, by a computer program, rather than being the result of continuous, instantaneous responses to contact made by nozzle (16). Clitheros et al. teach away from moving the processing head solely in response to contact between the nozzle and the side walls of the path to be followed by, instead, employing threaded guide rails that prohibit natural freedom of movement and prevent support block (28) from making unprogrammed adjustments in reaction to the contour of an application path.

For at least the above reasons, Applicants respectfully submit that Krueger et al. and Clitheros et al. do not teach or suggest each and every element recited in amended independent claims 1 and 25 and that these claims are, thus, patentably distinct from both Krueger et al. and Clitheros et al., taken either alone or in combination. Furthermore, Applicants submit that claims 6–10, 12–13, 44 and 47–56, which directly or indirectly depend from independent claims 1 or 25, are patentably distinct from Krueger et al. and Clitheros et al. for at least similar reasons. Accordingly, Applicants respectfully request withdrawal of these grounds of rejection.

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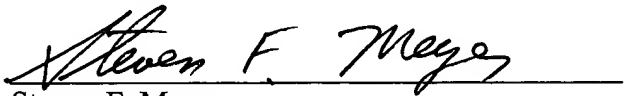
**CONCLUSION**

Based on the foregoing remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

Respectfully submitted,  
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